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9
10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 KATHRYN KINGHAM,

13 Plaintiff,

14 v.

15 STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, duly authorized to
16 conduct business in the State of Nevada;
DOES 1 through 10, inclusive, and ROE
17 CORPORATIONS 1 through 10, inclusive,

18 Defendants.
19

Case No.: 2:15-CV-01555-APG

STIPULATION TO EXTEND TIME TO
FILE A RESPONSE TO DEFENDANT'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT

(First Request)

20 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES, Plaintiff, Kathryn
21 Kingham, by and through her attorneys of record, William R. Brenske and Jennifer R. Andreevski
22 of Brenske & Andreevski, and Defendant, State Farm Mutual Automobile Insurance Company by
23 and through its attorneys of record, Robert Freeman and Pamela L. McGaha of Lewis Brisbois
24 Bisgard & Smith in accordance with Local Rule IA 6-1 of the Local Rules for the United States
25 District Court for the District of Nevada and Rule 6(b)(1)(A) of the Federal Rules of Civil
26 Procedure, to extend the deadline to answer or otherwise respond to Defendant, State Farm Mutual
27 Automobile Insurance Company's Motion for Partial Summary Judgment (Doc. No. 31) by two
28

1 weeks. Pursuant to this stipulation, responses to Defendant's motion shall be due on March 9, 2017.

2 Responses are currently due on February 23, 2017.

3 Good cause exists for this extension as Defendant's dispositive motion is 55-pages long and
4 includes over 2,700 pages of exhibits. There are also three claims Defendant is seeking to dismiss.
5 In order to oppose or otherwise respond to the motion, it is necessary to review all the exhibits
6 attached to Defendant's motion. Given the complexity of the motion and required response the
7 parties and their counsel hereby stipulate to a two week extension to file a response.
8

9 Extending the deadline to respond to State Farm's motion, up to and including March 9,
10 2017, will ensure Plaintiff has a full and fair opportunity to respond to Defendant's Motion for
11 Partial Summary Judgment (Doc. No. 31). A proposed order is provided below.

12 DATED: February 14, 2017

DATED: February 14, 2017

14 /s/William R. Brenske, Esq.

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20 *Attorneys for Plaintiffs, Carolyn Mann*

21 *individually and as Special Administrator of the*
22 *Estate of David Anthony Mann and as Assignee of*
23 *the Estate of Thomas Joseph Meyers*

14 /s/Pamela L. McGaha, Esq.

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24 *Attorneys for Defendant, State Farm Mutual*
25 *Automobile Insurance Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN KINGHAM,

Plaintiff,

v.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, duly authorized to
conduct business in the State of Nevada;
DOES 1 through 10, inclusive, and ROE
CORPORATIONS 1 through 10, inclusive,

Defendants.

Case No.: 2:15-CV-01555-APG

ORDER

Pursuant to the parties' stipulation it is hereby:

ORDERED responses to State Farm's Motion for Partial Summary Judgment (Document
No. 31) shall be due on or before March 9, 2017.

Dated: February 15, 2017.


The Honorable Andrew P. Gordon
United States District Judge